IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

CAMBRIA COUNTY ASSOCIATION FOR THE BLIND AND HANDICAPPED, INC.,)	
Plaintiff,)	
v.)	Civil Action No. 23-cv-80-SRF
AFFORDABLE WIRE MANAGEMENT, LLC,)))	
Defendant.)))	

JOINT CLAIM CONSTRUCTION CHART

Pursuant to the Court's Scheduling Order (D.I. 26 ¶ 8), Plaintiff Cambria County

Association for the Blind and Handicapped, Inc. ("CAB") and Defendant Affordable Wire

Management, LLC ("AWM") respectfully submit the Joint Claim Construction Chart attached
hereto as **Exhibit A**, identifying the disputed claim terms in U.S. Patent Nos. 10,177,551 (the
"551 Patent") and 11,349,291 (the "291 Patent") as well as the asserted claims in which each
such claim terms appear.

In addition to the intrinsic evidence identified in Exhibit A, the parties each reserve the right to rely on additional intrinsic evidence to the extent it is necessary to rebut arguments made by the adverse party during the claim construction briefing. Each party further reserves the right to rely on any intrinsic evidence identified by the adverse party.

Copies of the '551 Patent and the '291 Patent are attached hereto as **Exhibits B** and **C**, respectively.

Copies of the portions of the intrinsic record relied upon by the parties are attached as **Exhibits D** through **M**.

- Exhibit D consists of excerpted portions from the '551 Patent File History;
- Exhibit E consists of a copy of Patent Owner's Preliminary Response in IPR2024-00139;
- Exhibit F consists of a copy of the Declaration of Joshua Phinney, Ph.D., In Support of Patent Owner's Preliminary Response in IPR2024-00139;
- Exhibit G consists of excerpted portions from the '291 Patent File History;
- Exhibit H consists of excerpted portions from Decision Granting Institution of *Inter Partes* Review in IPR2024-00178;
- Exhibit I consists of a copy of the Declaration of Edward C Kern, Jr., Ph.D. in Support of Patent Owner's Preliminary Response in IPR2024-00182;
- Exhibit J consists of a copy of Exhibit 3002 in IPR2024-00182;
- Exhibit K consists of a copy of Exhibit 3003 in IPR2024-00182;
- Exhibit L consists of a copy of U.S. Pat. No. 9,722,405;
- Exhibit M consists of a copy of Patent Owner's Preliminary Response in IPR2024-00182.

Dated: May 9, 2024

Edward C. Flynn
ECKERT SEAMANS CHERIN &
MELLOT, LLC
600 Grant St., 44th Floor
Pittsburgh, PA 15219
(412) 566-6000
EFlynn@eckertseamans.com
Admitted Pro Hac Vice

BAYARD, P.A.

/s/ Ronald P. Golden III Stephen B. Brauerman (#4952) Ronald P. Golden III (#6254) 600 N. King Street, Suite 400 Wilmington, DE 19801 Telephone: (302) 655-5000 sbrauerman@bayardlaw.com rgolden@bayardlaw.com Daniel Melman
ECKERT SEAMANS CHERIN &
MELLOTT, LLC
10 Bank St., Suite 700
White Plains, NY 10606
(914) 949-2909
DMelman@eckertseamans.com
Admitted Pro Hac Vice

Theodore Y. McDonough
ECKERT SEAMANS CHERIN &
MELLOTT, LLC
Gateway IV, Suite 401
100 Mulberry St.
Newark, NJ 07102
(973) 855-4700
TMcDonough@eckertseamans.com
Admitted Pro Hac Vice

Attorneys for Plaintiff Cambria County Association for the Blind and Handicapped, Inc.

Andrew H. DeVoogd (pro hac vice)
Williams S. Dixon (pro hac vice)
Robert C. Sweeney (pro hac vice)
MINTZ LEVIN COHN FERRIS
GLOVSKY & POPEO PC
One Financial Center
Boston, Massachusetts 02111
(617) 542-6000
DHDeVoogd@mintz.com
WSDixon@mintz.com
RCSweeney@mintz.com

/s/ Michael J. Farnan
Brian E. Farnan (Bar No. 4089)
Michael J. Farnan (Bar No. 5165)
FARNAN LLP
919 N. Market St., 12th Floor
Wilmington, DE 19801
Phone: (302) 777-0300

Phone: (302) 777-0300 BFarnan@farnanlaw.com MFarnan@farnanlaw.com

Attorneys for Defendant Affordable Wire Management, LLC